

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

PALO ALTO NETWORKS, INC.,

Plaintiff,

v.

TAASERA LICENSING LLC and QUEST PATENT  
RESEARCH CORPORATION,

Defendants.

Case No. 1:22-cv-02306-ER

**NOTICE OF MOTION**

**ORAL ARGUMENT REQUESTED**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law in Support of Defendant Quest Patent Research Corporation’s Motion to Dismiss Palo Alto Networks, Inc.’s (“Palo Alto” or “Plaintiff”) First Amended Complaint (D.I. 21) for Declaratory Judgment of Non-Infringement and the exhibits thereto, the Declaration of John C. Scahill, and all prior pleadings and proceedings had herein, Defendant Quest Patent Research Corporation hereby moves this Court, at a time and date determined by the Court, for an order (i) pursuant to 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure (a) granting dismissal of Plaintiff Palo Alto Networks, Inc. First Amended Complaint (D.I. 21) for Declaratory Judgment of Non-Infringement as against Defendant Quest Patent Research Corporation in its entirety, and (b) a determination that no alter ego exists between defendants Taasera Licensing LLC and Quest Patent Research Corporation, and (ii) granting such other and further relief as the Court deems just and proper.

Dated: New York, New York  
June 23, 2022

Respectfully submitted,

**TARTER KRINSKY & DROGIN LLP**

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